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April 22, 2019

By ECF and Email

Honorable Sean Lane
United States Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

In Re: In re Jeffrey L. Liddle, Debtor, Case No. 19-10747 (shl)
Documents Produced by Counsel Financial II LLC in Response to Interim Order
Authorizing the Debtors to Use Cash Collateral

Dear Judge Lane:

On behalf of Counsel Financial II LLC ("CFII"), we submit the documents on the attached list, pursuant to the Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362 and 363 (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief" (the "Interim Order") [Dkt. No. 52] which provided that "[w]ithin seven (7) days of entry of this Interim Order, CF II shall disclose all documents concerning the status of their asserted security interest in or to, or a lien upon, the Cash Collateral, including any documents demonstrating CF II's satisfaction of the requirements for serving the Order of Attachment pursuant to the CPLR."

We will file a memorandum of law, addressing these documents and the related legal issues supporting CFII's security interest in and lien upon the Cash Collateral prior to the adjourned hearing on cash collateral scheduled for May 1st and will discuss a briefing schedule with Debtor's counsel.

Respectfully submitted,

/s/ David Wander

David H. Wander

Enclosures
cc via email
William Gray, Esq.
Andrea Schwartz, Esq.

In re Jeffrey L. Liddle, Debtor, Case No. 19-10747 (shl)

Documents Produced By Counsel Financial II LLC Pursuant to Interim Order	
Exhibit	Exhibit Description
Exhibit A	Revolving Promissory Note, dated August 5, 2016, and Allonges thereto dated October 13, 2016, and December 21, 2016, between Liddle & Robinson LLP and Counsel Financial II LLC
Exhibit B	Guaranty of Payment and Performance, dated August 5, 2016, between Jeffrey L. Liddle, Blaine H. Bortnick, James Ryan Hubbard, and Christine A. Palmieri and Counsel Financial II LLC
Exhibit C	Security Agreement, dated August 5, 2016, between Counsel Financial II LLC and Liddle & Robinson LLP, Jeffrey L. Liddle, Blaine H. Bortnick, James Ryan Hubbard, and Christine A. Palmieri
Exhibit D	UCC Financing Statement, dated July 25, 2016, with Liddle & Robinson LLP listed as Debtor and Counsel Financial II LLC listed as Secured Party
Exhibit E	UCC Financing Statement, dated August 11, 2016, with Jeffrey L. Liddle, Blaine H. Bortnick, and Christine Palmieri listed as Debtors and Counsel Financial II LLC listed as Secured Party
Exhibit F	Term Promissory Note, dated October 13, 2016, between Liddle & Robinson LLP and LIG Capital LLC
Exhibit G	Guaranty of Payment and Performance, dated October 13, 2016, between Jeffrey L. Liddle and LIG Capital LLC
Exhibit H	Security Agreement, dated October 13, 2016, between LIG Capital LLC and Liddle & Robinson LLP and Jeffrey L. Liddle
Exhibit I	UCC Financing Statement, dated October 14, 2016, with Liddle & Robinson LLP and Jeffrey L. Liddle listed as Debtors and LIG Capital LLC listed as Secured Party
Exhibit J	Revolving Promissory Note, dated June 2, 2017, between Liddle & Robinson LLP and Counsel Financial Holdings LLC
Exhibit K	Guaranty of Payment and Performance, dated June 2, 2017, between Jeffrey L. Liddle and Counsel Financial Holdings LLC
Exhibit L	Security Agreement, dated June 2, 2017, between Counsel Financial Holdings LLC and Liddle & Robinson LLP and Jeffrey L. Liddle
Exhibit M	UCC Financing Statement, dated June 2, 2017, with Liddle & Robinson LLP and Jeffrey L. Liddle listed as Debtors and C T Corporation System, as representative, listed as Secured Party (on behalf of Counsel Financial Holdings LLC)
Exhibit N	Amended Order to Show Cause, dated December 19, 2018

In re Jeffrey L. Liddle, Debtor, Case No. 19-10747 (shl)

Documents Produced By Counsel Financial II LLC Pursuant to Interim Order	
Exhibit	Exhibit Description
Exhibit O	UCC Financing Statement, dated January 2, 2019, with Jeffrey L. Liddle listed as Debtor and Counsel Financial LLC listed as Secured Party
Exhibit P	Second Amended Order to Show Cause, dated January 4, 2019
Exhibit Q	Stipulation and Order, dated February 1, 2019, and "So Ordered" on February 4, 2019
Exhibit R	Stenographic Transcript of Supreme Court of the State of New York, County of Erie's February 11, 2019 Bench Decision
Exhibit S	Supreme Court of the State of New York, County of Erie's February 27, 2019 Order to Diane C. Nardone
Exhibit T	Order of Attachment, dated March 7, 2019
Exhibit U	Notice of Entry of Order of Attachment, dated March 7, 2019
Exhibit V	Affidavit of Service of Order of Attachment and Notice of Entry of Order of Attachment, dated March 8, 2019